

TENNESSEE REGULATORY AUTHORITY

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2005 SEP 29 AM 8:43

460 James Robertson Parkway
Nashville, Tennessee 37243-0505
T.R.A. DOCKET ROOM

September 27, 2005

Patrick Crocker
Early, Lennon, Crocker & Bartosiewicz, P.L.C.
900 Commerica Building
Kalamazoo, Michigan 49007-4752

RE: IBFA Acquisition Company, LLC
Docket No. 05-00151

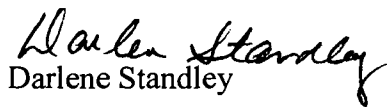
Dear Mr. Crocker:

The Staff of the Tennessee Regulatory Authority is in receipt of your correspondence dated September 19, 2005, in response to our September 7, 2005 request for additional information regarding the above company. Your response did not fully address the issues and questions presented in our request. Please provide the following information:

1. In regard to question 1 in our previous correspondence, please clarify whether IBFA will be reselling the long distance services of Cost Plus Communications, LLC.
2. Please clarify your statement in response to question 1 that "As a non-facilities-based wholesale provider, Cost Plus need not secure a certificate." Upon what statute or rule is IBFA resting this assumption? Please explain why you assert that Tenn. Code Ann. § 65-4-101 (6) and § 65-4-201 (b) do not apply to IBFA and Cost Plus Communications, LLC.
3. IBFA's response to question 3 of the previous request indicated the Asset Purchase Agreement between IBFA and American Farm Bureau, Inc. was attached as Exhibit A. However, there were no attachments to the response. Please provide a copy of the Asset Purchase Agreement to become a part of the record in this docket.
4. In response to question 4 of the previous response, IBFA states that "IBFA Acquisition Company, LLC intends to transact business in Tennessee under the name "Farm Bureau Connection" upon receiving approval by the TRA and Secretary of State." Does IBFA intend to amend its Application for Certificate to Provide Competing Local and Interexchange Telecommunications Services in Tennessee, TRA Docket Number 05-00151, to include the assumed name of Farm Bureau Connection? If so, please provide the required \$20,000 corporate surety bond in the complete name under which the company intends to conduct business in Tennessee and a certificate from the Secretary of State's Office in the company's complete business name.

Please provide the above information by October 14, 2005. In accordance with TRA Rules, please submit either (1) thirteen written copies of your response or (2) four written copies and an electronic version. If you have questions concerning this request or need additional information, please contact Lisa Foust at 615-741-2904 extension 220.

Sincerely,


Darlene Standley

Utilities Division Chief